

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING FTX RECOVERY TRUST’S ONE HUNDRED SEVENTY-
EIGHTH (SUBSTANTIVE) OMNIBUS OBJECTION
TO CERTAIN OVERSTATED AND/OR
UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

Upon the one hundred seventy-eighth omnibus objection (the “Objection”)² of the FTX Recovery Trust³, for entry of an order (this “Order”) sustaining the Objection and modifying and reducing the Overstated and/or Unliquidated Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

³ The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ (as defined below) confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the FTX Recovery Trust; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Overstated and/or Unliquidated Claim set forth in Schedule 1 attached hereto is modified and reduced. The claims listed in the column titled “Modified Claims” identified in Schedule 1 attached hereto shall remain on the claims register, subject to the FTX Recovery Trust’s further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the FTX Recovery Trust’s right to object on any other grounds that the FTX Recovery Trust discovers is preserved.
4. To the extent a response is filed regarding any Overstated and/or Unliquidated Claim, each such Overstated and/or Unliquidated Claim, and the Objection as it pertains to such Overstated and/or Unliquidated Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Overstated and/or Unliquidated Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested

matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

5. The FTX Recovery Trust is authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

6. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the FTX Recovery Trust may have to enforce rights of setoff against the claimants.

7. Nothing in the Objection or this Order, nor any actions or payments made by the FTX Recovery Trust pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors or the FTX Recovery Trust under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the FTX Recovery Trust's or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the FTX Recovery Trust; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

8. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

9. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable Karen B. Owens
Chief United States Bankruptcy Judge

SCHEDULE 1

Overstated and/or Unliquidated Claims

FTX Trading Ltd. 22-11068 (KBO)
One Hundred Seventy-Eighth Omnibus Claims Objection
Schedule 1 - Modified Claims

Asserted Claims						Modified Claim	
Claim Number	Name	Debtor	Tickers	Ticker Quantity		Debtor	Ticker Quantity
93601*	Name on file	West Realm Shires Services Inc.	ETH	5.000441010000000		West Realm Shires Services Inc.	0.000000010000000
			ETHW	27.101757420000000			27.101757420000000
			USD	19,000.000000002700000			0.000000002699380

Reason: The FTX Recovery Trust has conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's account. Accordingly, the FTX Recovery Trust seeks to modify the asserted claim to match their books and records.

27852*	Name on file	West Realm Shires Services Inc.	BTC	0.079124760000000		West Realm Shires Services Inc.	0.079124760000000
			ETH	0.438000000000000			0.438000000000000
			ETHW	0.438000000000000			0.438000000000000
			GRT	5,270.000000000000000			5,270.000000000000000
			UNI	80.700000000000000			80.700000000000000
			USD	2,767.120000000000000			1,383.562060030000000
			Other Activity Asserted: None - None				0.000000000000000

Reason: The FTX Recovery Trust has conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's account. No liability exists on account of the other activity asserted. Accordingly, the FTX Recovery Trust seeks to modify the asserted claim to match their books and records.

60264*	Name on file	West Realm Shires Services Inc.	BTC	0.228565300000000		West Realm Shires Services Inc.	0.193902600000000
			USD	3,871.910000000000000			7.620616020000000

Reason: The FTX Recovery Trust has conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's account. Accordingly, the FTX Recovery Trust seeks to modify the asserted claim to match their books and records.

1523*	Name on file	West Realm Shires Services Inc.	BAT			West Realm Shires Services Inc.	201.102726990000000
			BRZ				14,311.948056830000000
			BTC				0.236043030000000
			CUSDT				94.646240080000000
			DOGE				699.271128990000000
			ETH				1.153262880000000
			ETHW				1.152778300000000
			GRT				3.000000000000000
			LINK				1.385568190000000
			LTC				2.664729760000000
			MATIC				1,320.857170250000000
			NFT (330336717900272066/METaverse MASKS #20)				1.000000000000000
			NFT (340678128239383050/PARALLEL SCENE #21)				1.000000000000000
			NFT (473871459577857966/INJECT AND OBEY)				1.000000000000000
			SHIB				16,784,313.748228700000000
			SOL				4.453950320000000
			TRX				6,030.326148090000000
			USD	11,240.000000000000000			0.002829943598044
			YFI				0.058718920000000

Reason: The FTX Recovery Trust has conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's account. Accordingly, the FTX Recovery Trust seeks to modify the asserted claim to match their books and records.

97743*	Name on file	West Realm Shires Services Inc.	ALGO	Undetermined*		West Realm Shires Services Inc.	0.280741000000000
			ETH				0.414929630000000
			SHIB				0.000000010000000
			USD				101.852361380623000

Reason: The FTX Recovery Trust has conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's account. Accordingly, the FTX Recovery Trust seeks to modify the asserted claim to match their books and records.

19759*	Name on file	West Realm Shires Services Inc.	ETH			West Realm Shires Services Inc.	0.000000010000000
			POC Other NFT Assertions: GOLDEN STATE WARRIORS	4.000000000000000			0.000000000000000
			NFT (315509725445924351/GSW WESTERN CONFERENCE SEMIFINALS COMMEMORATIVE TICKET #736)				1.000000000000000
			NFT (345974164362123388/WARRIORS FOAM FINGER #243 (REDEEMED))				1.000000000000000
			NFT (383457554091913683/GSW CHAMPIONSHIP COMMEMORATIVE RING)				1.000000000000000
			NFT (395037637974986018/GSW WESTERN CONFERENCE FINALS COMMEMORATIVE BANNER #1411)				1.000000000000000
			NFT (473301362031422239/GSW ROUND 1 COMMEMORATIVE TICKET #24)				1.000000000000000
			NFT (538390643161905758/GSW WESTERN CONFERENCE FINALS COMMEMORATIVE BANNER #1412)				1.000000000000000
			USD				57.581402861022800

Reason: The FTX Recovery Trust has conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's account. Accordingly, the FTX Recovery Trust seeks to modify the asserted claim to match their books and records.

310*	Name on file	West Realm Shires Services Inc.	ETH			West Realm Shires Services Inc.	0.000320630000000
			ETHW				1.128320630000000
			USD	1,700.000000000000000			1,364.941464115170000

Reason: The FTX Recovery Trust has conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's account. Accordingly, the FTX Recovery Trust seeks to modify the asserted claim to match their books and records.

80218	Name on file	West Realm Shires Services Inc.	SOL			West Realm Shires Services Inc.	273.889841010000000
			USD	1,000.000000000000000			1,000.000000000000000

Reason: The FTX Recovery Trust has conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's account. Accordingly, the FTX Recovery Trust seeks to modify the asserted claim to match their books and records.

87752	Name on file	West Realm Shires Services Inc.	CUSDT	2.000000000000000		West Realm Shires Services Inc.	2.000000000000000
			DOGE	1.000000000000000			1.000000000000000
			LTC	0.052722210000000			0.052722210000000
			MATIC	234.125518360000000			234.125518360000000
			SOL	17.259580460000000			17.259580460000000
			SUSHI	26.942284720000000			26.942284720000000
			TRX	1.000000000000000			1.000000000000000
			USD	1.220003442264732			0.000003442264732

88801*: Claim was entered modified on the FTX Recovery Trust's One Hundred Fifty-Second (Non-Substantive) Objection to Certain Claims Filed Against the Insured Debtor (Customer Claims)

27852*: Claim was entered modified on the FTX Recovery Trust's One Hundred Fifty-Second (Non-Substantive) Objection to Certain Claims Filed Against the Insured Debtor (Customer Claims)

40264*: Claim was entered modified on the FTX Recovery Trust's One Hundred Fifty-Second (Non-Substantive) Objection to Certain Claims Filed Against the Insured Debtor (Customer Claims)

1523*: Claim was entered modified on the FTX Recovery Trust's One Hundred Fifty-Second (Non-Substantive) Objection to Certain Claims Filed Against the Insured Debtor (Customer Claims)

87743*: Claim was entered modified on the FTX Recovery Trust's One Hundred Fifty-Second (Non-Substantive) Objection to Certain Claims Filed Against the Insured Debtor (Customer Claims)

19759*: Claim was entered modified on the FTX Recovery Trust's One Hundred Fifty-Second (Non-Substantive) Objection to Certain Claims Filed Against the Insured Debtor (Customer Claims)

310*: Claim was entered modified on the FTX Recovery Trust's One Hundred Fifty-Second (Non-Substantive) Objection to Certain Claims Filed Against the Insured Debtor (Customer Claims)

Undetermined*: Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims					Modified Claim	
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Debtor	Ticker Quantity
Other Activity Asserted: 2,000 - FTX us						0.000000000000000

Reason: The FTX Recovery Trust has conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer’s account. No liability exists on account of the other activity asserted. Accordingly, the FTX Recovery Trust seeks to modify the asserted claim to match their books and records.